

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA

-v-

MICHAEL AVENATTI,

Defendant.

19-CR-374-1 (JMF)

**AFFIDAVIT OF CLARK
O. BREWSTER IN
SUPPORT OF MOTION
TO QUASH SUBPOENA
TO CLARK O.
BREWSTER**

-----X
State of Oklahoma)
) ss:
County of Tulsa)

Clark O. Brewster, being duly sworn, hereby deposes and says as follows:

1. I am the principal and managing attorney of Brewster & DeAngelis, PLLC, a law firm in Tulsa, Oklahoma.
2. I am over the age of 18, of sound mind, and have never been convicted of a crime. I execute this instrument based on my personal knowledge of the operative facts and circumstances. If called on, I would testify to its contents under oath.
3. I submit this affidavit in support of my motion to quash Mr. Avenatti's January 7, 2022 subpoena *issued to me* in the above-captioned matter.
4. The undersigned is personal counsel to Ms. Stephanie Clifford, the alleged victim of Mr. Avenatti's alleged criminal conduct in this case.
5. The trial subpoena requires the undersigned's attendance for trial on January 24, 2022 in New York. *See* Trial Subpoena, Ex. A.
6. The subpoena did not come with witness fees nor has the defendant (or his counsel) made any arrangements with me for the payment of fees.


7. In the Rider, the subpoena claims that the “defendant is indigent and invokes Rule 17(b) F.R.CRIM.P.” *See* Ex. A.
8. At my direction, my office staff reviewed this Court’s docket for this case in search of (a) the defendant’s application for a subpoena to issue to the undersigned; and (b) an order from this Court approving issuance of this subpoena to me. My office staff reported to me that they located neither.
9. The at-issue subpoena has a Rider, that makes several document requests to the undersigned.

The requests have been summarized below:

- Provide any and all communications between Clark Brewster and the United States Attorney’s Office for the Southern District of New York relating to Michael Avenatti or Stephanie Clifford (aka Stormy Daniels). This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.
 - Provide any and all communications between Clark Brewster and the Federal Bureau of Investigation relating to Michael Avenatti or Stormy Daniels. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.
 - Provide any and all communications between Clark Brewster and Luke Janklow relating to Michael Avenatti or Stormy Daniels. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.
 - Provide any and all communications between Clark Brewster and St. Martin’s Press relating to Michael Avenatti or Stormy Daniels. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.
10. The deadline for compliance is January 24, 2022. Thus far, the Parties have been unable to resolve their differences about the manner and scope of the subpoena.

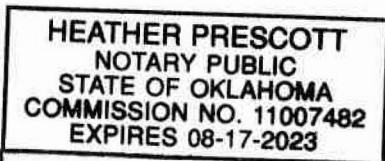
11. I state under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.


Dated: January 18, 2022


Clark O. Brewster, OBA #1114
Pro Hac Vice applied for and pending
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State of Oklahoma)
) ss:
County of Tulsa)

This instrument was acknowledged before me on this 18th day of January, 2022 by Clark O. Brewster.




Notary Public

(S E A L)

My Commission Expires: 8-17-2023